



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2466

CAD 008 302
903
20

Ref: 8ENF-L

AUG 25 1999

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Chuck Trombold
Plant Manager
Onyx Environmental Services
(f/k/a/ Chemical Waste Management, Inc.)
1704 West First Street
Azusa, CA 91702

Mr. Greig Siedor
Chief Legal Officer
Onyx Environmental Services
(f/k/a Chemical Waste Management, Inc.)
720 Butterfield Road
Lombard, IL 60148

Re: Notice of Intent to File and Opportunity to Confer

Dear Messrs. Trombold and Siedor:

This letter is to notify you that United States Environmental Protection Agency, Region 8 ("EPA"), intends to file an administrative action against Chemical Waste Management, Inc., and other related parties including its present corporate owner, Onyx Environmental Services (collectively, "Chem Waste"), seeking penalties for violations of the Resource Conservation and Recovery Act, as amended, 42 U.S.C. §§ 6901, et seq. ("RCRA"). This notice is also intended to provide you with an opportunity to confer with the enforcement team prior to filing of the administrative complaint, as explained below. An information request pursuant to Section 3007 of RCRA, 42 U.S.C. § 6928, is also being transmitted to you under separate cover.

EPA, initially through an inspection performed by the State of Colorado Department of Public Health and Environment of the Union Pacific Railroad yard at Sterling, Colorado, and after review of additional information in its files, has identified manifest violations associated with certain shipments of hazardous waste from the Chem Waste facility in Azusa, California. The hazardous waste in question was shipped under Hazardous Waste manifest #s 97687, 98048 and 98082 to the Clean Harbors Environmental Services, Inc., facility, near Kimball, Nebraska ("designated facility.") EPA's review noted that these shipments each took over 45 days to complete and that exception reports were not filed in the proper regulatory time frame with the State of California or with any EPA office. These acts or omissions constitute violations of EPA RCRA generator regulations at 40 C.F.R. § 262.42 and analogous delegated State of California hazardous waste program regulations.



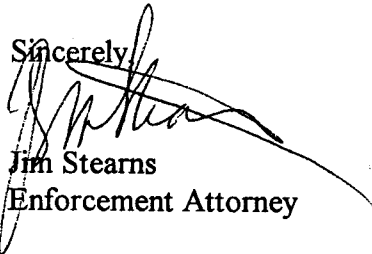
Printed on Recycled Paper

The violations noted are subject to an enforcement action pursuant to Section 3008(a) of RCRA, 42 U.S.C. § 6928(a), which, in conjunction with the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701 (and see 40 C.F.R. Part 19), provides for the assessment of up to \$27,500 per day of non-compliance for each violation. The EPA is prepared to issue an administrative complaint against Chem Waste seeking an appropriate civil penalty based on the statutory maximum penalty for the violations listed above, calculated in accordance with EPA's RCRA Civil Penalty Policy, October 1990. This letter is intended to provide Chem Waste the opportunity to participate in a meeting to explain why EPA should not seek such a penalty, to provide additional relevant information (actions to remedy violations etc.) and/or to negotiate a settlement prior to the issuance of an administrative complaint. Settlement of the matter would be effected through an administrative consent agreement pursuant to 40 C.F.R. Part 22.

This meeting must be held no later than September 16, 1999. The meeting may take place in EPA's Region VIII office in Denver or may be conducted by conference call. Chem Waste has the right to be represented by counsel in this discussion but it is not required. During this meeting or conference call, Chem Waste will have the opportunity to meet with legal and technical representatives from EPA who will be available to answer questions regarding the basis for the allegations as well as EPA's enforcement process.

Please contact me at (303) 312-6912 regarding the scheduling of this meeting and/or if you have any questions regarding the purpose or format of the meeting. If I do not hear from Chem Waste by September 8, 1999, I will assume that it is not interested in participating in such a meeting and EPA will commence filing of an administrative complaint to resolve this issue. Once a complaint is issued, Chem Waste will have all the rights and obligations afforded to it pursuant to EPA's "Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits," 40 C.F.R. Part 22, including the opportunity for a settlement conference and/or hearing. A copy of the new Part 22 rules and RCRA Penalty Policy is enclosed.

Sincerely,


Jim Stearns
Enforcement Attorney

Enclosures:

RCRA Penalty Policy
Part 22 Rules
SBREFA information

cc: John Works, EPA Region 8, ENF-T
EPA Region 9
Dennis Andrade, California RCRA Program
Scott Klarich, CDPHE



Printed on Recycled Paper



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2466

Ref: 8ENF-T

AUG 25 1999

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Chuck Trombold
Plant Manager
Onyx Environmental Services
(f/k/a/ Chemical Waste Management, Inc.)
1704 West First Street
Azusa, CA 91702

Mr. Greig Siedor
Chief Legal Officer
Onyx Environmental Services
(f/k/a Chemical Waste Management, Inc.)
720 Butterfield Road
Lombard, IL 60148

Re: Request for Information Pursuant to
Section 3007 of the Resource
Conservation and Recovery Act (RCRA),
42 U.S.C. § 6927

Dear Messrs. Trombold and Siedor:

Pursuant to Section 3007 of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6927, the U.S. Environmental Protection Agency Region VIII (EPA) requests that Onyx Environmental Services and Chemical Waste Management, Inc., send the following information within fifteen (15) calendar days of receipt of this letter to Mr. John D. Works at the above-captioned address:

1. Legible, true and accurate copies of all Uniform Hazardous Waste Manifests for all shipments of hazardous waste from, or generated at, the Chemical Waste Management, Inc., facility in Azusa, California (EPA I.D. #CAD008302903) and destined for the Clean Harbors Environmental Services, Inc., Kimball, Nebraska, facility during the period from September 1997 through May 1998, including but not limited to all such manifests completed and signed by the designated facility.

2. For the hazardous waste shipments described above in Question 1, legible, true and accurate copies of all attachments and addendums, if any, to the requested manifests, and all related shipping papers and other supporting transport records documenting the handling and routing of all such shipments.



Printed on Recycled Paper

3. A clear and full explanation of all discrepancies appearing on or in relation to the manifests (and addendums, etc.) and/or shipping papers for the shipments described above in Question 1, or noted by the generator upon return of any empty railcar, including railcars that may have been returned with residual materials, or "heels", in the car. For purposes of this request, the term "discrepancies", shall include, but not be limited to, differences between the quantity of hazardous waste designated on the manifest or shipping paper as accepted by the initial transporter and the quantity of hazardous waste actually received by the designated facility, and incidences for which the date on the manifest of the handwritten signature of the owner or operator of the designated facility is equal or greater than 45 days from the date the waste was accepted by the initial transporter.

4. For each shipment of hazardous waste described above in Question 1 for which any portion of the materials shipped was not accepted by the designated facility, a clear and full explanation of the subsequent management and fate of such material or "heel", including but not limited to the quantity of such materials, their subsequent transport, routing, and disposition, and any designated alternate facilities. Please provide legible, true and accurate copies of all manifests, addendums, attachments, shipping papers, and other supporting transport records documenting the subsequent shipment and final disposition and/or return to the generator of the residual or "heel" materials described above, including all manifests completed and signed by the designated alternate facilities, if any.

5. For all hazardous waste shipments described above in Question 1, please provide legible, true and accurate copies of all Exception Reports, if any, filed in accordance with 40 C.F.R. § 262.42(a) or with the analogous requirements of the State hazardous waste management program. Your response should include the date such filings or reports were submitted and the address of the individual or office to which they were sent. Please provide all records documenting any additional or related contacts or notices made to EPA or State offices regarding such exception reports or the underlying hazardous waste shipments.

Your response to this request shall include a certification statement with your title/signature/date (or that of another responsible official of your company) which reads:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision. The information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



Please provide the requested information within fifteen (15) calendar days from receipt of this letter to:

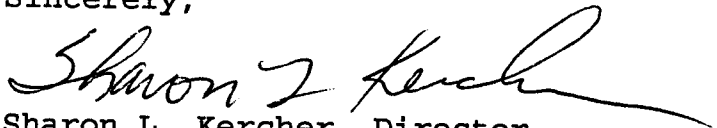
John D. Works, 8ENF-T
Technical Enforcement Program
U.S. Environmental Protection Agency, Region 8
999 18th Street, Suite 500
Denver, CO 80202-8466

Failure to provide the requested information or submittal of incomplete and/or false information may subject you to civil or criminal liability pursuant to Section 3008 of RCRA, 42 U.S.C. § 6928. In addition, 18 U.S.C. § 1001 makes it a criminal offense to falsify information to the United States Government.

The information requested by this letter must be provided notwithstanding its possible characterization as confidential information or trade secret. However, you may request, in accordance with and subject to the limitations of 40 C.F.R. Part 2, treatment of certain information as Confidential Business Information (CBI). CBI requests must be made at the time of submission or such information will not be protected as CBI by EPA. Notwithstanding any CBI claims asserted, all information subject to this request must be submitted within the time frame specified.

Your cooperation and assistance in providing the requested information is appreciated. Should you have any questions concerning this matter, please contact Mr. John Works of my staff at the above address or by telephone at (303) 312-6196.

Sincerely,



Sharon L. Kercher, Director
Technical Enforcement Program

cc: John Works, 8ENF-T
Jim Stearns, 8ENF-L
Scott Klarich, CDPHE





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

January 14, 1991

Deborah J. Schmall
Landels, Ripley & Diamond
Hills Plaza
350 Steuart Street
San Francisco, CA 94105

Re: Oil and Solvent Process Company's
RCRA Part B Permit Petition

Dear Ms. Schmall:

I am pleased to inform you that the RCRA Part B Permit for the Oil and Solvent Process Company ("OSCO") has been finalized. The final permit includes the modified language as negotiated between OSCO and EPA. OSCO had previously agreed to withdraw its RCRA Part B Permit Petition provided the final RCRA Part B Permit reflected the negotiated terms; such withdrawal appears appropriate at this time.

Please contact me with any further questions.

Sincerely yours,

Mark J. Klaiman
Assistant Regional Counsel

cc: Tom Kelly (EPA)

H. B. J.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, Ca. 94105-3901

MAY 12 1992

Lee Dodge
Regional Environmental Engineer
Chemical Waste Management Corp.
4227 Technology Drive
Fremont, CA 94538-6337

Dear Mr. Dodge:

This letter confirms that Chemical Waste Management, Inc. will attempt to measure water levels at off-site wells and piezometers within a one mile radius of the Oil and Solvent Process Company (OSCO) facility (CAD 008302903), located at 1704 First Street in Azusa California. Chemical Waste Management, Inc. (CWM) will measure water levels at selected off-site wells monthly for three months. Each month, CWM will attempt to measure water levels at both on- and off-site within a 72 hour period. This requirement has been incorporated into OSCO's operating permit pursuant to EPA authority under Section 3004(b) of the Resource Conservation and Recovery Act of 1976, as amended by the Hazardous and Solid Waste Amendments (hereafter referred to as RCRA).

EPA expects CWM to exercise its best efforts to obtain access to off-site wells to complete the required measurements. In the unlikely event that CWM is unable to obtain access, RCRA §3007(a) and CERCLA §104(e) authorize EPA to enter property to inspect and obtain samples, or to direct compliance with an EPA request for access or sampling.

You also requested clarification of EPA's relationship with the Department of Toxic Substances Control (DTSC) with regards to the OSCO permit. EPA, at present, issues permits and directly implements other responsibilities in accordance with Federal law. The California Department of Toxic Substances (DTSC) independently issues permits in accordance with State law. Both EPA and DTSC have issued permits for CWM's OSCO facility.

Lee Dodge, Chemical Waste Management
Page 2

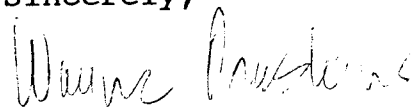
EPA's and DTSC's roles may soon change, however. The State of California has submitted a request to EPA for RCRA authorization. If the State is authorized, EPA would retain oversight responsibility and remain involved at high priority facilities, but not issue RCRA permits. In any case, OSCO's EPA permit will remain in effect until the time that the current permit requires a modification necessitating public notice. At that time, DTSC may elect to merge the EPA and State permits. However, DTSC is not obligated to merge the permits. In the event the permits are not merged, the EPA permit will remain valid and enforceable until its expiration date.

You also asked that we clarify EPA's relationship with the California Regional Water Quality Control Board (Regional Board). EPA and Regional Board staff coordinate efforts and routinely share information on the hundreds of facility investigations underway in the San Gabriel Valley. Regional Board staff are aware that EPA is the lead agency overseeing the OSCO investigation.

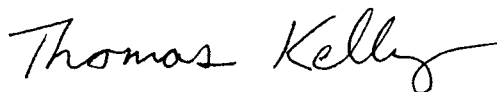
Because the OSCO facility is located on the San Gabriel Valley Superfund Sites, EPA retains authority to ensure that all investigation and cleanup work located onsite is completed consistent with the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA") and implementing regulations. EPA retains this authority regardless of whether the investigation is directly overseen by the Regional Board or EPA.

If you have any additional questions, please contact us directly. Wayne Praskins can be reached at (415) 744-2259; Tom Kelly can be reached at (415) 744-2067.

Sincerely,



Wayne Praskins
South Coast Groundwater Section
Superfund Programs
Hazardous Waste Management Div.



Thomas Kelly
Permits Section
Waste Programs
Hazardous Waste Management Div.

cc: Mark Klaiman, EPA Office of Regional Counsel
Sunita Sharma, Oil and Solvent Process Co.
Andy Bajwa, DTSC Region 3

FAX TRANSMISSION

TO

Name:

Lee Dodge

Organization:

CWM

Mail Stop:

Fax Number:

Area Code

Number

510

651-0913

Verification Number:

Area Code

Number

FROM

Name:

Tom Kelly

Mail Stop:

H-3-2

Branch:

Division/Office:

Address:

Region 9

U.S. Environmental Protection Agency

75 Hawthorne Street

San Francisco, CA 94105



Phone Number:

Area Code

Number

415

744-2067

Fax Number:

Area Code

Number

415

744-1044

Verification Number:

Area Code

Number

415

DATE

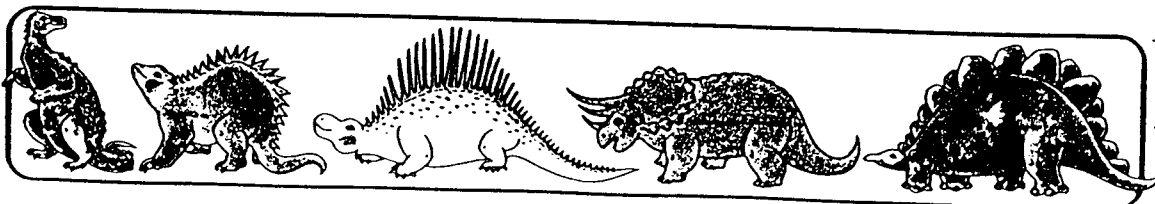
5/12/92

NUMBER OF PAGES
(including cover)

3

SUBJECT

NOTE





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX

75 Hawthorne Street
San Francisco, Ca. 94105

William J. Mitzel
General Manager
Oil & Solvent Process Company
107 South Motor
Azusa, California 91702

25 OCT 1991 In Reply Refer to: H-4-3

Dear Mr. Mitzel:

RE: Certification of Violation Correction for Oil & Solvent
Process Company

On May 9, 1991, a hazardous waste investigation was conducted by representatives of the Environmental Protection Agency (EPA) at Oil & Solvent Process Company (OSCO) in Azusa, California. During the course of this investigation, information was gathered in accordance with Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended [42 U. S. C. 6927].

Pursuant to Section 3008 of RCRA [42 U. S. U. 6928], EPA required you to correct the identified areas of noncompliance and to submit documentation of their correction to EPA within 30 days of your receipt of the Warning Letter and inspection report sent on September 13, 1991.

The facility's subsequent responses dated October 9, 1991 address the violations and document the facility's return to compliance with the regulations cited in the inspection report. This letter shall not be construed as a determination by EPA of your compliance with any other applicable regulation.

OSCO, Azusa facility should continue to take the necessary steps to maintain and ensure compliance with all applicable Federal, State and local environmental requirements.

If you have any questions please call Diane Bodine of my staff at (415) 744-2130.

Sincerely,

Karen Schwinn
Chief
Waste Compliance Branch

cc: Scott Simpson, CAL EPA, DTSC, Reg. 3
Larry Matz, CAL EPA, HQ

D. Bodine
H-4-3
OK 9/17/91
10

H-4-3
Remand
10/18/91

H-4
RSch
10/23/91



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, Ca. 94105

13 SEP 1991

WARNING LETTER

CERTIFIED MAIL NO. P347537193
Return Receipt Requested
In Reply
Refer to: H-4-3

William J. Mitzel
General Manager
Oil & Solvent Process Company
107 South Motor
Azusa, California 91702

Dear Mr. Mitzel:

On May 9, 1991, a hazardous waste investigation was conducted by representatives of the Environmental Protection Agency (EPA) at Oil & Solvent Process Company (OSCO), in Azusa, California, EPA Identification Number CAD008302903. During the course of this investigation information was gathered in accordance with Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended [42 U. S. C. 6927]. A copy of the investigation report is enclosed for your information and response. The report describes conditions at the facility at the time of the investigation, and identifies areas of noncompliance with RCRA regulations and potential violations of Subtitle C of RCRA. Any omissions in the report shall not be construed as a determination of compliance with applicable regulations.

Pursuant to Section 3008 of RCRA [42 U. S. C. 6928] you are required to correct the identified area of noncompliance and to submit documentation of their correction to EPA within 30 calendar days of your receipt of this letter. Your response must include a letter signed by a duly authorized official of your facility, certifying correction of the identified areas of noncompliance. Documentation of your return to compliance may consist of, among other things, photographs, manifests and revised records.

By copy of this letter, EPA is providing the State of California with notice of the referenced violation of Subtitle C of RCRA. EPA is also providing the State with notice that it intends to take appropriate enforcement action if the facility does not resolve the violations within the time specified above and the State does not take appropriate enforcement action. The State of

OK
N. Bodine
9/9/91
H-4-3
Diamond
9/10/91
H.4
J. H. H.
9/10/91

California may notify EPA of its intent to assume or decline responsibility to take such action to resolve the referenced violations.

EPA reserves the right to take further enforcement action as it deems appropriate. However, your response to this letter will be considered in determining the need for further enforcement action.

EPA routinely provides copies of investigation reports to State agencies, and upon request, to the public. Such releases are handled according to the Freedom of Information Act regulations (40 CFR Part 2). If you believe this report contains privileged or confidential information, you may make a claim within fifteen (15) working days from your receipt of this letter. EPA will construe your failure to furnish a timely claim as a waiver of the confidentiality claim.

Your response to this Warning Letter, is due within 30 days of your receipt of this letter, shall be mailed to:

Diane Bodine H-4-3 and to
US EPA, Region 9
75 Hawthorne St.
San Francisco, CA 94105

Paul Baranich
CA DHS, Region 3
1405 N. San Fernando Blvd.
Suite 300
Burbank, CA 91504

If you have questions related to technical aspects of this investigation report or this letter, please contact Diane Bodine at (415) 744-2130.

Sincerely,

Karen Schwinn
Chief
Waste Compliance Branch

Enclosure

cc: Scott Simpson, CA DHS/TSCD, Region 3 (w/encl.)
Don Johnson, CA DHS/TSCD, HQ (w/o encl.)

P 347 537 193

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

U.S.G.P.O. 1989-234-555

PS Form 3800, June 1985

Sent to <i>Wm T. Metzger, Gen Mgr</i>	
Street and No. <i>Old & Solvent Process Co</i>	
P.O., State and ZIP Code <i>107 South Main Ogden CA 97402</i>	
Postage	
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date <i>9/13/91</i>	

WARNING LETTER

CERTIFIED MAIL NO. P 000 582 487
RETURN RECEIPT REQUESTED

23 AUG 1989

In Reply
Refer to: T-2-4

22 AUG 1989

Dr. Arthur Chester, Director
Hughes Research Laboratory
3011 Malibu Canyon Rd.
Malibu, CA 90265

Dear Dr. Chester:

On July 28, 1988, a hazardous waste investigation was conducted by representatives of the California Department of Health Services on behalf of the Environmental Protection Agency (EPA) at Hughes Research Laboratory, Identification Number CAD 041156969. During the course of this investigation, information was gathered in accordance with Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended [42 U.S.C. 6427]. A copy of the investigation report is enclosed for your information and response. The report describes conditions at the facility at time of the investigation, and identifies areas of the noncompliance with RCRA regulations and potential violations of Subtitle C of RCRA. Any omissions in the report shall not be construed as a determination of compliance with applicable regulations.

Pursuant to Section 3008 of RCRA [42 U.S.C. 6928] you are required to correct the identified areas of noncompliance and to submit documentation of their correction to EPA within 30 calendar days of your receipt of this letter. Your response must include a letter signed by a duly authorized official of your facility, certifying correction of the identified areas of noncompliance. Documentation of your return to compliance may consist of, among other things, photographs, manifests and revised records.

SYMBOL	T-2-4	T-2-4	T-2-4	T-2-4		
SURNAME	Fischer	Spencer	Thompson	Thompson		
DATE	8/11/89	8/14/89	8/17/89	8/22/89		
U.S. EPA CONCURRENCES						

OFFICIAL FILE COPY

P 000 582 487

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

★ U.S.G.P.O. 1984-446-014

PS Form 3800, Feb. 1982

Sent to	
<i>Mr Arthur Chester Davis</i>	
Street and No. <i>Hughes Research Lab</i>	
<i>3011 Malibu Canyon Rd</i>	
P.O., State and ZIP Code	
<i>Malibu, CA 90265</i>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	<input checked="" type="checkbox"/>
Return receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	
<i>3 AUG 1986</i>	

Failure to achieve full compliance with regard to the deficiencies cited in this report within the thirty day period may result in an enforcement action by EPA under Section 3008 of RCRA. Section 3008 of RCRA provides that violations of Subtitle C of RCRA and its regulations may be punished by fines not to exceed twenty-five thousand dollars (\$25,000) per day for every day on which a violation occurs

EPA routinely provides copies of investigation reports to agencies, and upon request, to the public. Such releases are handled according to the Freedom of Information Act regulations (40 CFR Part 2). If you believe this report contains privileged or confidential information, you may make a claim within fifteen (15) working days from your receipt of this letter. EPA will construe your failure to furnish a timely claim as a waiver of the confidentiality claim.

Your response to this Warning Letter, due to EPA within 30 days of your receipt of this letter, should be mailed to:

Janice Fraser, T-2-4
Waste Compliance Branch
215 Fremont Street
San Francisco, CA 94105

If you have any questions related to this letter, you may contact Ms. Janice Fraser (T-2-4) at (415) 974-7520.

Original Signed by:

Karen Schwinn
Chief
Waste Compliance Branch

Enclosure

cc: Scott Simpson, DHS-Region 3
Don Johnson, DHS-HQ

bc: Schimmel
Fraser

08 JUL 1989

John A. Hinton, P.E., Chief
 Facility Permitting Unit
 Toxic Substances Control Division (Region 3)
 California Department of Health Services
 1405 N. San Fernando Boulevard, Suite 300
 Burbank, CA 91504

Re: RCRA Facility Assessment Report For Oil & Solvent Process
 Company (OSCO), EPA I.D. # CAD 008302903

Dear Mr. Hinton:

The Region 9 Office of the U.S. Environmental Protection Agency (EPA) has completed its review of the draft RCRA Facility Assessment (RFA) Report for Oil & Solvent Process Company.

The report submitted by your office on April 20, 1989 was evaluated for consistency with the RCRA Facility Assessment Guidance document. Our comments on the report, which is the first RFA report completed by the Region 3 office of the California Department of Health Services, Toxic Substances Control Division, are in the form of recommendations to be used in writing future RFA reports.

We would like to commend your staff on the excellent technical quality and thoroughness of the report. The level of detail is consistent with the objectives outlined in the RCRA Facility Assessment Guidance document which was used by the permit writer, Henry Chiu, to complete the report.

We would also like to emphasize that the "Suggestions For Further Actions" section of any RFA report is very important and should identify all needs for further investigation of releases to groundwater, soil, surface water, air and or releases of subsurface gases. The "Sampling Visit" portion of the RCRA Facility Assessment referenced in the guidance document and which will ultimately be used to determine the need for a RCRA Facility Investigation (RFI) for Solid Waste Management Units is currently being addressed in draft RCRA permits as "Phase I RFI" plans. These investigations are more limited in scope than the "RFI" and require the owner/operator to conduct a focused sampling program for each appropriate media. The agency will then make a determination

SYMBOL	on the need for the more extensive RFI. This, however, should not preclude the permit writer from requiring the full		
SURNAME	<i>D. D. [Signature]</i>	<i>[Signature]</i>	<i>[Signature]</i>
DATE	7/3/89	7-5-89	

RFI initially if it is determined to be necessary based on available information in the RFA report.

The RFA reports should also clearly identify "regulated" waste management units and units which are only "Solid Waste Management Units (SWMUs)." "Regulated" units are hazardous waste management units and are required to comply with the technical requirements for operation and closure that are identified in 40 C.F.R. Parts 264 or 265. SWMUs, however, may or may not be hazardous waste management units. The regulatory authority to address corrective action for SWMUs is codified as 40 C.F.R. 264.101. The HSWA statute gives EPA the authority to address releases of hazardous constituents from units that are not hazardous waste management units but which manage solid waste as defined in 40 C.F.R. Part 261.

The above comments should be viewed as recommendations for future RFA reports to be submitted to EPA. EPA accepts this draft RFA report for OSCO as final and again wishes to commend your staff for their excellent work.

If you have any questions, please contact David Osugi of my staff at (415) 974-7405.

Sincerely,

Michael Feeley, Chief
State Programs Branch
Hazardous Waste Management Division

cc: Dennis Dickerson, Section Chief
Toxic Substances Control Division (Region 3)
California Department of Health Services (DHS)

Jose Kou, Senior Waste Management Engineer
Toxic Substances Control Division (Region 3)
California Department of Health Services (DHS)

Paul Blais, Chief
Hazardous Waste Management Section
Toxic Substances Control Division
California Department of Health Services (DHS)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

215 Fremont Street
San Francisco, Ca. 94105

WARNING LETTER

CERTIFIED MAIL NO. P 849 189 474
RETURN RECEIPT REQUESTED

In Reply Refer To: CAD008302903

Oil and Solvent Process Company
1704 West First Street
Azusa, CA 91702

DRAFT

To whom it may concern:

During the weeks of January 11 and 25, 1988, an investigation was conducted at Oil and Solvent Process Company (OSCO) located at 1704 West First Street, Azusa, California, by a representative(s) of the U.S. Environmental Protection Agency (EPA), National Enforcement Investigations Center (NEIC). ~~A copy of that portion of the inspection report that relates to your facility is enclosed.~~ In the course of this investigation, information was gathered in accordance with Section 3007 of the Resource Conservation and Recovery Act, as amended (RCRA). Jacobs Engineering Group Inc., an EPA contractor, is assisting EPA in the preparation of and follow-up on this warning letter. *delete*

The following deficiency was observed during the records review and facility inspection:

40 CFR Section ~~262.11(a)~~ and 268.7(a)

OSCO failed to adequately characterize hazardous wastes. Restricted F-solvents were mixed with characteristic (ignitable) D001 wastes, and the resulting waste was defined as characteristic, D001, waste. This action constitutes non-compliance with waste characterization requirements and the requirements for handling of restricted wastes. Once a waste has been defined as restricted it cannot be recharacterized as non-restricted, except in the case of solidification of liquid wastes that contain California ~~list~~ metals at levels above the prohibition levels.

You are hereby requested to submit a written report within thirty (30) days of receipt of this letter certifying that compliance with respect to the above deficiency has been achieved. Please include the following information in your response:

A statement which documents that, effective upon receipt of this letter, wastes will be characterized in accordance with the requirements of 40 CFR Section 262.11(a) and 40 CFR Section 268.7(a), and that all personnel responsible for waste characterization and paperwork will be trained in these requirements.

Failure to achieve full compliance with the deficiencies cited in this letter within the thirty (30) day period may result in an enforcement action by EPA under Section 3008 of RCRA. ~~You would be subject to liability for the imposition of penalties of up to twenty-five thousand dollars (\$25,000) for each day of non-compliance in accordance with Section 3008 of RCRA.~~

Your response should be addressed to ^{Byron Kesner} ~~Marta Williams~~, Jacobs Engineering Group Inc., ~~2530 Arnold Drive, Martinez, California 94553.~~
P.O. Box 8717, Albuquerque, New Mexico 87198-8717

If you have any questions or require additional information, please contact ~~Marta Williams at (415) 228-9700.~~
Byron Kesner at (505) 262-1505

Sincerely,

Karen Schwinn, Chief
Waste Compliance Branch

KS:br

Enclosures

cc: John Ellison, NEIC

Section 3008 of RCRA provides that violations of Subtitle C of RCRA and its regulations may be punished by fines not to exceed twenty-five thousand dollars (\$25,000) per day for every day on which a violation occurs.

WARNING LETTERCERTIFIED MAIL NO. P 849 189 474
RETURN RECEIPT REQUESTED

In Reply Refer To: CAD008302903

Oil and Solvent Process Company
1704 West First Street
Azusa, CA 91702

To whom it may concern:

During the weeks of January 11 and 25, 1988, an investigation was conducted at Oil and Solvent Process Company (OSCO) located at 1704 West First Street, Azusa, California, by a representative(s) of the U.S. Environmental Protection Agency (EPA), National Enforcement Investigations Center (NEIC). A copy of that portion of the inspection report that relates to your facility is enclosed. In the course of this investigation, information was gathered in accordance with Section 3007 of the Resource Conservation and Recovery Act, as amended (RCRA). Jacobs Engineering Group Inc., an EPA contractor, is assisting EPA in the preparation of and follow-up on this warning letter.

The following deficiency was observed during the records review and facility inspection:

40 CFR Section 262.11(a) and 268.7(a)

OSCO failed to adequately characterize hazardous wastes. Restricted F-solvents were mixed with characteristic (ignitable) D001 wastes, and the resulting waste was defined as characteristic, D001, waste. This action constitutes non-compliance with waste characterization requirements and the requirements for handling of restricted wastes. Once a waste has been defined as restricted it cannot be recharacterized as non-restricted, except in the case of solidification of liquid wastes than contain California List metals at levels above the prohibition levels.

You are hereby requested to submit a written report within thirty (30) days of receipt of this letter certifying that compliance with respect to the above deficiency has been achieved. Please include the following information in your response:

A statement which documents that, effective upon receipt of this letter, wastes will be characterized in accordance with the requirements of 40 CFR Section 262.11(a) and 40 CFR Section 268.7(a), and that all personnel responsible for waste characterization and paperwork will be trained in these requirements.

CONCURRENCES

SYMBOL	JEG							
SURNAME	Williams							
DATE	12-30-88							

Failure to achieve full compliance with the deficiencies cited in this letter within the thirty (30) day period may result in an enforcement action by EPA under Section 3008 of RCRA. You would be subject to liability for the imposition of penalties of up to twenty-five thousand dollars (\$25,000) for each day of non-compliance in accordance with Section 3008 of RCRA.

Your response should be addressed to Marta Williams, Jacobs Engineering Group Inc., 2530 Arnold Drive, Martinez, California 94553.

If you have any questions or require additional information, please contact Marta Williams at (415) 228-9700.

Sincerely,

Karen Schwinn, Chief
Waste Compliance Branch

KS:br

Enclosures

cc: John Ellison, NEIC

bc: Elaine Schimmel (T-2-4)
Jeanette Siewierski (T-2-4)
Marta Williams, Jacobs Engineering Group Inc.

P 849 189 474

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL
(See Reverse)

PS Form 3800, June 1985 EPA #: CAD 008 302 903

Sent to Oil and Solvent Process Company	
Street and No. 1704 West First Street	
P.O., State and ZIP Code Azusa, CA 91702	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date Letter Sent _____	

WARNING LETTER

80 JUN 1989

**CERTIFIED MAIL NO. P 849 189 474
RETURN RECEIPT REQUESTED**

In Reply Refer To: CAD008302903

Oil and Solvent Process Company
1704 West First Street
Azusa, CA 91702

To whom it may concern:

During the weeks of January 11 and 25, 1988, an investigation was conducted at Oil and Solvent Process Company (OSCO) located at 1704 West First Street, Azusa, California, by a representative(s) of the U.S. Environmental Protection Agency (EPA), National Enforcement Investigations Center (NEIC). In the course of this investigation, information was gathered in accordance with Section 3007 of the Resource Conservation and Recovery Act, as amended (RCRA). Jacobs Engineering Group Inc., an EPA contractor, is assisting EPA in the preparation of and follow-up on this warning letter.

The following deficiency was observed during the records review and facility inspection:

40 CFR Section 268.7(a)

OSCO failed to adequately characterize hazardous wastes. Restricted F-solvents were mixed with characteristic (ignitable) D001 wastes, and the resulting waste was defined as characteristic, D001, waste. This action constitutes non-compliance with waste characterization requirements and the requirements for handling of restricted wastes. Once a waste has been defined as restricted it cannot be recharacterized as non-restricted, except in the case of solidification of liquid wastes that contain California list metals at levels above the prohibition levels.

You are hereby requested to submit a written report within thirty (30) days of receipt of this letter certifying that compliance with respect to the above deficiency has been achieved. Please include the following information in your response:

A statement which documents that, effective upon receipt of this letter, wastes will be characterized in accordance with the requirements of 40 CFR Section 262.11(a) and 40 CFR Section 268.7(a), and that all personnel responsible for waste characterization and paperwork will be trained in these requirements.

CONCURRENCES							
SYMBOL	T-2-4	T-3-4	T-2-4	T-2-4			
SURNAME	J. J. J.	J. J. J.	J. J. J.	J. J. J.			
DATE	6/16/89	6/17/89	6/24/89	6/29/89			

EPA Form 1320-1 (12-70)

OFFICIAL FILE COPY

Failure to achieve full compliance with the deficiencies cited in this letter within the thirty (30) day period may result in an enforcement action by EPA under Section 3008 of RCRA. Section 3008 of RCRA provides that violations of Subtitle C of RCRA and its regulations may be punished by fines not to exceed twenty-five thousand dollars (\$25,000) per day for every day on which a violation occurs.

Your response should be addressed to Byron Kesner, Jacobs Engineering Group Inc., P.O. Box 8717, Albuquerque, New Mexico 87198-8717.

If you have any questions or require additional information, please contact Byron Kesner at (505) 262-1505.

Sincerely,

Karen Schwinn, Chief
Waste Compliance Branch

KS:br

Enclosures

cc: John Ellison, NEIC
Larry matz, DHS - HQ
Scott Simpson, DHS - Regim 3

bc: Schimmel, T-2-4
Feeley, T-2 A



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

215 Fremont Street
San Francisco, Ca. 94105

21 MAR 1989

Philip L. Comella
Environmental Counsel
Chemical Waste Management, Inc.
3003 Butterfield Road
Oak Brook, Ill. 60521

Re: Oil and Solvent Process Company (OSCO)
Request for Temporary Authorization

Dear Mr. Comella:

I spoke with John Van Gessell of your office by telephone yesterday. As I mentioned to him, EPA is in receipt of OSCO's request for temporary authorization under 40 C.F.R. § 270.42(e), dated December 12, 1988, and OSCO's request for a permit modification under 40 C.F.R. § 270.42(b), dated December 21, 1988.

This letter confirms EPA's intent to process both requests under the procedures for temporary authorization. However, it is my understanding that OSCO was not in possession of the facility mailing list until approximately February 10, 1989, and therefore was unable to notify those persons on the mailing list of its request for temporary authorization pursuant to 40 C.F.R. § 270.42(e)(2)(iii). Therefore, I suggest that OSCO notify those persons on the mailing list and submit documentation of such notification to EPA, so that EPA may continue to process OSCO's request.

If you have any questions, please feel free to contact me at (415) 974-0717.

Sincerely,

Karen Goldberg
Karen Goldberg
Assistant Regional Counsel

15
February 6, 1989

In Reply: T-2-2
Refer To: OSCO Oil and Sol-
vent Process Co.
EPA ID CAD
008302903

Bill Mitzel
General Manager
Oil and Solvent Process Co.
1704 West First Street
Azusa, CA. 91702

Subject: Visual Site Inspection; OSCO; Azusa CA.
EPA ID No. CAD008302903

Dear Mr. Mitzel:

Pursuant to the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. 6927, the California Department of Health Services (DHS) and the U.S. Environmental Protection Agency (EPA), Region 9, will conduct a visual site inspection as part of the RCRA Facility Assessment (RFA).

An RFA is required for facilities that manage hazardous waste. The objective of this evaluation is to determine whether there have been, or are likely to be, releases of hazardous waste or hazardous constituents at the facility requiring further investigation. This analysis will provide information to establish priorities for a subsequent RCRA Facility Investigation.

An integral part of the RFA is a Visual Site Inspection (VSI) to verify the location of all "Solid Waste Management Units" (SWMUs). The term SWMU includes "any unit at the facility from which hazardous constituents might migrate, irrespective of whether the units were intended for the management of solid and/or hazardous wastes" (50 FR 28702, July 15, 1985). This definition includes container storage units; tanks; surface impoundments; waste piles; land treatment units; landfills; incinerators; underground injection wells; physical, chemical and biological treatment units; recycling units; and areas contaminated by routine and systematic discharges from process areas.

SYMBOL	T-2-2	T-2-2				
SURNAME	W. R. E.	W. R. E.				
DATE	2-13-89	2-14-89				
U.S. EPA CONCURRENCES			OFFICIAL FILE COPY			

We plan to visit your facility in order to inspect these SWMUs. The purpose of this inspection is to enable DHS and EPA to gain a technical understanding of current and historical waste handling practices. Photographs of each SWMU will be taken to document conditions at the facility and waste management practices.

EPA may require the assistance of some of your personnel in reviewing solid waste flows, associated units, past and present disposal practices, construction and detail of units, and other solid waste information. In addition, attached to this letter is a partial list of files to which EPA and/or DHS request access during the site inspection. Representatives of EPA and DHS will conduct the VSI on February 22~~23~~ 1989. If necessary, a second day of inspection will be arranged.

If you have any questions, please feel free to contact me at (415) 974-7405.

Sincerely,

David Osugi
Environmental Scientist
California Permits Section

Attachments: VSI Agenda
Proposed Inspection Schedule
Attachment I: Potential SWMUs at OSCO
Attachment II: Preliminary Information Needs for
RCRA Facility Assessment (RFA)

cc: Leo Stahlecker
OSCO
1704 West First St.
Azusa, CA. 91702

Jose Kou
Dept. of Health Services
1405 No. San Fernando
Blvd. #300
Burbank, CA. 91702

Henry Chui
Dept. of Health Services
1405 No. San Fernando Blvd. #300
Burbank, CA. 91702

Hank Yacoub
Regional Water Quality
Control Board
107 So. Broadway #4027
L.A., CA. 90012

RCRA FACILITY ASSESSMENT (RFA)

VISUAL SITE INSPECTION (VSI) AGENDA

FACILITY: OSCO Oil and Solvent Process Co.
Azusa, CA.

EPA ID No.: CAD 008302903

DATE OF INSPECTION: February 2³~~2~~, 1989

PERSONNEL: Jose Kou, Dept. of Health Services
Henry Chui, Dept. of Health Services
Dave Osugi, U.S. EPA

PURPOSE OF INSPECTION:

The Hazardous and Solid Waste Amendments of 1984 (HSWA) broaden the scope of EPA's authority under RCRA by requiring corrective action for releases of hazardous wastes and constituents at facilities that manage hazardous wastes. The RCRA Facility Assessment (RFA) is conducted to evaluate the potential for releases to the environment and the need for corrective action.

The RFA includes a desk-top preliminary review (PR) of the available file information, a visual site inspection (VSI) of the facility and, if necessary, a sampling visit.

The purpose of the VSI is to:

1. Survey the site for hydrologic, geologic, and surficial features.
2. Identify Solid Waste Management Units (SWMUs) and other areas of concern.
3. Review site information with facility representatives. Photographs will be taken of all SWMUs and other areas of concern.

INSPECTION ORGANIZATION

The inspection personnel will perform a one-day inspection tour. If needed, another day of inspection will be scheduled.

The team will inspect the process layout of production facilities, waste generation, treatment and storage facilities, including recycling units and pathways for release of wastes to soil, ground water, surface water and air.

An interview with facility staff will be performed to develop a better understanding of past waste disposal practices. The team will concentrate on developing a better understanding of the waste generation, treatment, and storage facilities. A review of site-specific data will be performed.

The overall goal of this inspection plan is to enable the team to trace waste streams from arrival through storage and treatment.

Preliminary Information Needs have been submitted as Attachment II to aid your personnel in preparing for the site visit. These issues will be discussed in an introductory meeting during the VSI.

RCRA FACILITY ASSESSMENT
VISUAL SITE INSPECTION
PROPOSED INSPECTION SCHEDULE

February 22³, 1989: 9 AM - 5 PM

1. Introductory meeting
2. Inspection Team will meeting with OSCO personnel to discuss:
 - o Purpose of visit;
 - o Agenda;
 - o Safety and health considerations;
 - o Facility history and operations; and
 - o Additional general information needs or those pertaining to identified SWMUs which may result in the generation of waste streams
3. Begin tour of facility
4. Closing meeting

ATTACHMENT I

Potential SWMUs at OSCO Oil and Solvent Process Co.

- Unit 1. Former process wastewater sump
2. Former runoff pond
 3. Distillation Unit #1
 4. Distillation Unit #2
 5. Distillation Unit #3
 6. Vertical storage tank #11 (1,500 gal)
 7. Vertical storage tank #15 (5,000 gal)
 8. Cone bottom tank #2 (5,000 gal)
 9. Cone bottom tank #3
 10. Cone bottom tank #9
 11. Cone bottom tank #10
 12. Cone bottom tank #14
 13. Cone bottom tank #22
 14. Cone bottom tank #23
 15. Cone bottom tank #24
 16. Cone Bottom tank #25
 17. Cone bottom tank #26
 18. Cone bottom tank #27
 19. Cone bottom tank #28
 20. Cone bottom tank #30
 21. Cone bottom tank #32
 22. Cone bottom tank #33
 23. Cone bottom tank #34
 24. Cone bottom tank #35

25. Cone bottom tank #40
26. Cone bottom tank #85
27. Cone bottom tank #86
28. Cone bottom tank #87
29. Cone bottom tank #88
30. Cone bottom tank, #N
31. Cone bottom tank, #S
32. Vertical tank #104 (4,200 gal)
33. Vertical tank #105 (28,000 gal)
34. Laboratory wastewater tank
35. S. Rail, vertical tank
36. N. Rail, vertical tank
37. Thin film evaporator unit
38. Former laboratory wastewater tank (underground)
39. Former drummed storage tanks for line wash solvent
40. Current exterior truck wash area
41. Former lab area, dry chemicals, etc.
42. Current drum waste staging area and for consolidation of lab samples
43. Former waste drum filling area
44. Former storage area used for drums to be reconditioned. Current drummed waste storage.
45. Former drummed waste solvent storage area
46. Current drummed waste solvent storage area
47. Former storage area for drum reconditioning and waste solvents
48. Former storage for empty drums awaiting reconditioning
49. Former drum area for clear solvent and clear drum solvent storage

50. Areas of concern:

- o Rail spur for shipping/receiving waste or product
- o 14 stains and 8 spills, including 1/7/85 spill from pipe leading to tank 101 (OSCO 1988, Appendix C), as seen in aerial photos
- o Pathways of two historic surface drainages
- o Underground pipelines (2) from maintenance to current exterior wash area
- o Underground pipelines (4) from former tank storage for diesel fuel to heaters
- o Drying tanks, clean, recycled solvent
- o Tanks for virgin/clean recycled solvent (in two locations)
- o Former drum virgin solvent storage
- o Former underground motor fuel storage and diesel tanks
- o Current virgin/clean recycled drum filling and drummed solvent storage

ATTACHMENT II

Preliminary Information Needs for RCRA Facility Assessment

Information Needs Identified with Specific SWMUs

The following information is required for every SWMU listed in Attachment I:

- o Dates of operation
- o Operational status of the unit
- o Waste types, quantities, and frequency of disposal
- o Waste management and operational practices
- o Release controls associated with the unit
- o History of leaks, spills or other uncontrolled releases

3 APR 1985

In Reply T-3-2
Refer to: R(85)E031

Kenneth J. O'Morrow
 Director of Environmental & Technical Affairs
 Oil & Solvent Process Company
 1704 West First Street
 P.O. Box 907
 Azusa, CA 91702

Dear Mr. O'Morrow:

On November 26, 1984, a hazardous waste investigation was conducted at your facility. During the course of this investigation, information was gathered in accordance with Section 3007 of the Resource Conservation and Recovery Act of 1976. A copy of our investigation report is enclosed for your information.

EPA routinely provides copies of investigation reports to State agencies. Such releases will be handled according to the basic rules governing business confidentiality claims contained in the Code of Federal Regulations (40 CFR Part 2). Any claim of confidentiality should be made within fifteen (15) working days from the receipt of this letter. EPA will construe a failure to furnish timely comments as a waiver of the confidentiality claim.

If you have questions related directly to technical aspects of this report, please contact Tamara Brode at (415) 974-7407. Questions related to compliance with your final permit should be directed to the Los Angeles office of the State Department of Health Services at (213) 620-2380.

Sincerely yours,

Original Signed By:

Kathleen G. Shimmin
 Chief, Field Operations Branch

Enclosure

cc: Tom Bailey, DOHS-HQ (w/o encl.)
 Gil Jensen, DOHS-HQ (w/encl.)
 Angelo Belloso, DOHS-Los Angeles (w/encl.)

CONCURRENCES

SYMBOL	T-3-2	T-3-2	T-3				
SURNAME	Brode	Mano	Rin for KGS				
DATE	4-2-85	4-3-85	4-3-85				

RCRA INSPECTION REPORT
ENVIRONMENTAL PROTECTION AGENCY, REGION 9
TOXICS AND WASTE MANAGEMENT DIVISION
FIELD OPERATIONS BRANCH

Purpose: RCRA Investigation

Facility: Oil & Solvent Process Company
1704 West First Street
Azusa, California 91702

Facility ID Number: CAD008302903

Report Number: R(85)E031

Date of Inspection: November 26, 1984

EPA Inspector: Tamara Brode
Environmental Engineer

Facility Representative: Kenneth J. O'Morrow
Director of Environmental
& Technical Affairs

Report Prepared By: Tamara Brode

Report Date: April 2, 1985

BACKGROUND

- Oil and Solvent Processing Company (OSCO) obtained a hazardous waste facility permit on August 19, 1983 from DOHS for the storage of hazardous waste prior to recycling.

INVESTIGATION

OSCO recycles halogenated and non-halogenated solvents. Solvent drums are accumulated within the bermed storage area. Here, every drum is sampled to determine flammability and percent stillable solvents. Wastes containing at least 55% stillable solvents are processed. Those containing less than 55% are mixed with the still-bottom wastes. Flammable wastes are placed in a segregated area within the berm that is 50 feet from the property line.

When enough feed for a specific batch is accumulated, the waste solvents are pumped from the drums to cone-shaped tanks for physical separation. Any water present is collected and transported in bulk to a Class II/I facility for disposal. The solids that settle near the bottom are collected and mixed with the still bottoms.

After the solvent has undergone physical separation, it is distilled. The still-bottom mixture is tested for its heating value. Mixtures with a high enough heating value are sent to a cement kiln in Lebec, California. If the heating value isn't high enough, the mixture is solidified and sent to a Class I facility for disposal.

About one to three 6,500 gallon loads of fuel is sent to Lebec per month. About the same amount of water waste is sent to a Class II/I facility. Very few drums of waste are sent to a Class I facility.

POTENTIAL VIOLATIONS

None

ATTACHMENTS

- A) RCRA Checklist
- B) Photographs
- C) Waste Analysis Plan
- D) Inspection Schedule
- E) Contingency Plan
- F) Closure Plan

In Reply T-3-2
Refer To: FIS 1

1751-100
Mr. Kenneth J. O'Morrow
Director of Technical and Environmental Affairs
Oil & Solvent Process Company
1704 W. First Street
Azusa, CA 91702

Dear Mr. O'Morrow:

A preliminary site inspection was made of the Oil and Solvent Process Company on April 13, 1984. A copy of the investigation report is enclosed for your information.

Comments may be provided by you concerning any aspect of the report. In your response please refer to report number C(84)C337.

EPA routinely provides copies of investigation reports to State agencies. Such releases will be handled according to the basic rules governing business confidentiality claims contained in the Code of Federal Regulations (40 CFR Part 2). Any claim of confidentiality should be made within fifteen (15) working days from the receipt of this letter. EPA will construe a failure to furnish timely comments as a waiver of the confidentiality claim.

If you have questions concerning this report, please contact Jerelean Johnson at (415) 974-7515.

Sincerely,

Kathleen G. Shimmin
Chief, Field Operations Branch

Enclosure

cc: Thomas E. Bailey, DOHS

bc: T-4-2, Takata
T-4-1, J. Johnson
T-3-2, Demarest

		CONCURRENCES			
SYMBOL	T-3-2: Joe: 8/16/84; Barry: 9/10/84				
SURNAME	Demarest	Shimmin			
DATE	9/10/84	9/11/84	9/11/84		

(F17)
Tina Bradford

In Reply T-3-2
Refer To: FIS 1

Mr. Kenneth J. O'Morrow
Director of Technical and Environmental Affairs (818-334-5117)
Oil & Solvent Process Company
1704 W. First Street
Azusa, CA 91702

Dear Mr. O'Morrow:

A preliminary site inspection was made of the Oil and Solvent Process Company on April 13, 1984. A copy of the investigation report is enclosed for your information.

Comments may be provided by you concerning any aspect of the report. In your response please refer to report number C(84)C337.

EPA routinely provides copies of investigation reports to State agencies. Such releases will be handled according to the basic rules governing business confidentiality claims contained in the Code of Federal Regulations (40 CFR Part 2). Any claim of confidentiality should be made within fifteen (15) working days from the receipt of this letter. EPA will construe a failure to furnish timely comments as a waiver of the confidentiality claim.

If you have questions concerning this report, please contact Jerelean Johnson at (415) 974-7515.

Sincerely,

[Signature]

Kathleen G. Shimmin
Chief, Field Operations Branch

Enclosure

cc: Thomas E. Bailey, DOHS

bc: T-4-2, Takata
T-4-1, J. Johnson
T-3-2, Demarest ✓

T-3-2:Joe:8371:8/16/84: Barry;9/10/84

In Reply T-3-2
Refer To: FIS 1 ✓

Mr. Thomas E. Bailey
Toxic Substances Control Division
California Department of Health Services
714 "P" Street
Sacramento, CA 95814

Dear Mr. Bailey:

Attached please find a copy of Ecology & Environment's preliminary site inspection report for Oil & Solvent Process Company (C(84)C337) done under contract to the EPA.

Please allow 20 days from the date the report is received by your office before releasing the information, in order to give the facility the opportunity to claim confidentiality.

If you have any questions or comments, please direct them to Jerelean Johnson at (415) 974-7515.

Sincerely,

Kathleen G. Shimmin
Chief, Field Operations Branch

Enclosure

bc: T-4-2, Takata
T-3-2, Demarest
T-4-1, J. Johnson

T-3-2:Demarest:Joe:7445:8/16/84-- Barry;9/10/84

CONCURRENCES							
SYMBOL	T-3-2	T32	T-3				
SURNAME	Demarest	in	Shimmin				
DATE	9/10/84	9-11-84	9/11/84				

EPA Form 1320-1 (12-70)

OFFICIAL FILE COPY

In Reply T-3-2
Refer To: FIS 1

Mr. Thomas E. Bailey
Toxic Substances Control Division
California Department of Health Services
714 "P" Street
Sacramento, CA 95814

Dear Mr. Bailey:

Attached please find a copy of Ecology & Environment's preliminary site inspection report for Oil & Solvent Process Company (C(84)C337) done under contract to the EPA.

Please allow 20 days from the date the report is received by your office before releasing the information, in order to give the facility the opportunity to claim confidentiality.

If you have any questions or comments, please direct them to Jerelean Johnson at (415) 974-7515.

Sincerely,

Kathleen G. Shimmin
Chief, Field Operations Branch

Enclosure

bc: T-4-2, Takata
T-3-2, Demarest
T-4-1, J. Johnson

T-3-2:Demarest:Joe:7445:8/16/84-- Barry;9/10/84